

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90

**Comments of the
Schools, Health & Libraries Broadband (SHLB) Coalition**

The Schools, Health & Libraries Broadband Coalition (“SHLB Coalition”)¹ respectfully submits these comments in response to the Wireline Competition Bureau’s recent Public Notice regarding the Connect America Fund cost model virtual workshop.²

The SHLB Coalition is a broad-based coalition consisting of representatives of schools, health care providers, libraries, private sector companies, for-profit and not-for-profit broadband providers, state and national research and education (R&E) networks, state mapping agencies, municipalities, philanthropic foundations, consumer organizations and others.³ All members of the SHLB Coalition share the common goal of bringing open, affordable, high-capacity broadband to community anchor institutions across the United States.

The SHLB Coalition is pleased that the Bureau has asked for information specifically about the costs of providing high-capacity broadband services to community anchor institutions (CAIs). The broadband needs of CAIs are often overlooked, but their demand for high-capacity broadband grows more urgent every day.

Community anchor institutions provide a wide variety of Internet-based services to the community, including distance learning, public access computing, digital literacy training, telemedicine, job training, and basic research. Community anchor institutions also serve the

¹ “SHLB Coalition” is pronounced “Shell-Bee Coalition.”

² See, “WIRELINE COMPETITION BUREAU ADDS TWO NEW DISCUSSION TOPICS TO CONNECT AMERICA COST MODEL VIRTUAL WORKSHOP,” WC Docket No. 10-90; released June 17, 2013, DA 13-1396.

³ See www.shlb.org for a current list of the members of the SHLB Coalition.

disabled, the elderly, low-income people, and other vulnerable members of the community who might not otherwise have access to the Internet. In short, broadband is an essential component of the increasingly valuable and diverse array of services that these institutions provide to **all** members of the community, not just residential consumers.

Unfortunately, there are several indications that community anchor institutions do not have sufficient broadband services to meet the needs of their communities today, such as:

- An FCC survey of E-rate participants found that “[n]early 80% of all [schools and libraries in the E-rate program] say their broadband connections do not fully meet their current needs.” (In fact, 20% of E-rate participants state that broadband services meet their needs sometimes, rarely, or not at all).⁴
- An OCLC survey of public libraries showed that “ensuring adequate Internet access” was the top priority of public libraries, and that e-books are the most popular new initiative;⁵
- One-third of school technology leaders (34 percent) identified Internet capacity and bandwidth issues as their most challenging technology issue today, and only 15 percent of district administrators and technology leaders said they have enough connectivity to meet current needs;⁶
- A recent report from the Horizon Foundation concluded that community colleges’ infrastructure is under-resourced, that personalized learning is not adequately supported by current technology, and that the digital divide remains an issue, particularly given the socio-economic diversity of the community college population.⁷
- A survey of school IT leaders conducted by the Consortium for School Networking (COSN) found that the top 3 priorities that IT leaders named for 2012-13 are Bring Your Own Device (BYOD) programs, assessment readiness, and broadband access. According

⁴ 2010 E-Rate Program and Broadband Usage Survey: Report, Federal Communications Commission, Wireline Competition Bureau, DA 10-2414, released Jan. 6, 2011, available at www.fcc.gov.

⁵ “A Snapshot of Priorities and Objectives: Public Libraries.” OCLC, 2012, p.3 (available at <https://www.oclc.org/content/dam/oclc/reports/us-libraries/214758usb-A-Snapshot-of-Priorities-and-Perspectives.pdf>)

⁶ “From Chalkboards to Tablets: The Digital Conversion of the K-12 Classroom,” Speak Up 2012 National Findings K-12 Educators and Parents, April 2013, p. 14 (available at http://www.tomorrow.org/speakup/SU12_DigitalConversion_EducatorsReport.html).

⁷ Johnson, L., Adams Becker, S., Cummins, M., Estrada, V., Freeman, A., Ludgate, H. (2013). Technology Outlook for Community, Technical, and Junior Colleges 2013-2018: An NMC Horizon Project Sector Analysis. Austin, Texas: The New Media Consortium.” pp 19-20.

to COSN, “these priorities reflect the growing focus on the Common Core State Standard initiative for online assessments and the need for schools and districts to prepare for these assessments. The recent Assessment Readiness Survey by Partnership for Assessment of Readiness for College and Careers (PARCC) (www.parcconline.org) found that 80% of schools will not meet the requirements for online assessments.”⁸

- The National Broadband Plan found that 29% of the 3700 rural health care clinics were located in areas where mass-market broadband was not available. The Plan then noted that most health clinics need much greater capacity than 4 Mbps capacity typically available to households, so the number of rural health clinics who do not have access to high-capacity broadband is much higher than 29%.⁹

The need for high-capacity broadband services will become even more urgent over the next few years. K-12 schools need to comply with the national Common Core testing requirements beginning in 2014, and many schools need more broadband capacity so that they can fulfill these testing requirements.¹⁰ Furthermore, public education is increasingly embracing individualized, “personalized learning” that uses technology in the classroom.¹¹ Public libraries are increasingly using technology to provide digital literacy training, offering “maker spaces” to young entrepreneurs, supporting e-books, and providing on-line access to e-government, health and job training services.¹² Hospitals and health clinics are making increasing use of

⁸ See CoSN’s K-12 IT Leadership Survey 2013, available at <http://www.cosn.org/Default.aspx?TabId=14326>.

⁹ See, “Connecting America: The National Broadband Plan,” released March 17, 2010, Chapter 10.

¹⁰ “Bandwidth Demands Rise as Schools Move to Common Core,” EducationWeek, Oct. 15, 2012, (<http://www.edweek.org/dd/articles/2012/10/17/01bandwidth.h06.html>.); “Rural Schools Struggle to Prepare for Common Core’s Online Tests,” StateImpactOhio, March 21, 2013, (<http://stateimpact.npr.org/ohio/2013/03/21/rural-schools-struggle-to-prepare-for-common-cores-online-tests/>).

¹¹ According to the U.S. Department of Education:

technology infuses classrooms with digital learning tools, such as computers and hand held devices; expands course offerings, experiences, and learning materials; supports learning 24 hours a day, 7 days a week; builds 21st century skills; increases student engagement and motivation; and accelerates learning. Technology also has the power to transform teaching by ushering in a new model of connected teaching. This model links teachers to their students and to professional content, resources, and systems to help them improve their own instruction and personalize learning.

“Use of Technology in Teaching and Learning” (<http://www.ed.gov/oii-news/use-technology-teaching-and-learning>.)

¹² According to the Information Policy and Access Center at the University of Maryland (which issues the Public Library Funding and Technology Access Studies):

electronic medical records and the use of telemedicine is growing.¹³ All of these trends will require anchor institutions to have much more Internet capacity than they have today.

For these reasons, several organizations have set out goals for improved broadband connections to anchor institutions and called for greater public investments in broadband networks and services, such as:

- The U.S. National Broadband Plan Goal #4 declares that “Every American community should have affordable access to at least 1 gigabit per second broadband service to anchor institutions such as schools, hospitals and government buildings.”¹⁴
- The State Educational Technology Directors Association (SETDA) recommends that public schools should have an external connection to an Internet Service Provider (ISP) that has a minimum of 1 Gbps bandwidth for every 1,000 students/staff by the 2017-2018 school year;¹⁵
- Former FCC Chairman Genachowski recognized the importance of high-capacity broadband networks for economic growth and for anchor institutions by launching a Gigabit City Challenge, which calls upon each state to have at least one Gigabit City by 2015;¹⁶

The technology training services offered by libraries are an important component of the services they provide to the community, with 90.2% of libraries offering some type of training (see Figure 1). Librarians report that usage of patron technology training classes has increased at 36.3% of libraries and only 4.5% report a decrease. Librarians recognize the value of these services, ranking technology training 3.8 out of 5 in terms of the importance of services offered to the community (5 being the highest importance).

<http://ipac.umd.edu/survey/analysis/digital-literacy-public-libraries>.

¹³ See, “The Doctor Will Skype You Now,” Bloomberg BusinessWeek, August 21, 2012, available at <http://www.businessweek.com/articles/2012-08-23/the-doctor-will-skype-you-now>. (“Increased broadband availability and lower costs for the technology are helping telemedicine spread, says Thomas Nesbitt, University of California Davis’s associate vice chancellor for strategic technologies and alliances.”)

¹⁴ “Connecting America: The National Broadband Plan,” released March 17, 2010, (National Broadband Plan) p.10.

¹⁵ “The Broadband Imperative: Recommendations to Address K12 Education Infrastructure Needs,” May 12, 2012, available at <http://www.setda.org/web/guest/broadbandimperative>.

¹⁶ “FCC Chairman Genachowski Issues Gigabit City Challenge to Providers, Local and State Governments To Bring At Least One Ultra-Fast Gigabit Internet Community by Every State in U.S. by 2015. FCC’s Broadband Acceleration Initiative to Foster Gigabit Goal.” January 18, 2013, available at <http://www.fcc.gov/document/fcc-chairman-genachowski-issues-gigabit-city-challenge>.

- President Obama declared that the ConnectED initiative will “within five years, connect 99 percent of America’s students, through next-generation broadband (at speeds no less than 100 Mbps and with a target of 1 Gbps) to, and high-speed wireless within, their schools and libraries.”¹⁷

From this it is clear that CAIs need broadband that is affordable, reliable and scalable to much higher capacity than exists today. The FCC is working within a constrained budget of approximately \$1.8 billion for price cap carriers. Given this budget constraint, the question becomes what is the best use of these limited resources. The SHLB Coalition respectfully submits that the FCC can achieve the greatest “bang for the buck” by ensuring that community anchor institutions are provided affordable high-capacity broadband services because 1) CAIs serve the general public, including residential and other users, and 2) CAIs provide essential services, such as educational, medical, informational services that are most needed by their communities; and 3) CAIs provide digital literacy training that can help to promote broadband adoption and use by residential users.

The SHLB Coalition has not had an opportunity to delve into the details of the proposed cost model for the provision of service to anchor institutions in the proposed study areas by price cap carriers. We plan to provide more detailed information to the Bureau in the near future through the public ex parte process. We appreciate the Bureau’s effort to understand the needs of community anchor institutions for open, affordable, high-capacity broadband.

Respectfully Submitted,



John Windhausen, Jr
Executive Director
Schools, Health & Libraries Broadband Coalition (SHLB Coalition)
jwindhausen@shlb.org
(202) 256-9616

July 15, 2013

¹⁷ “ConnectED: President Obama’s Plan for Connecting All Schools to the Digital Age,” The White House, June 6, 2013, available at <http://www.whitehouse.gov/the-press-office/2013/06/06/president-obama-unveils-connected-initiative-bring-america-s-students-di>.